



ORIGINAL  
FILE

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February 26, 1991

Donna Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20054

MAR 07 1991

Dear Ms. Searcy,

Enclosed are 9 (nine) copies of our comments with regard to the Telocator Petition for Rulemaking to amend Part 22 concerning the use of 930 - 931 Mhz for Advanced Messaging Service. The rulemaking reference number is: RM-76-17.

Thank you for forwarding our comments to each of the commissioners.

Sincerely,

Jay Moskowitz  
President

JM/jmb

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MAR - 7 1991 960 S. Broadway  
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Federal Communications Commission  
Office of the Secretary

February 26, 1991

With reference to: Telocator Petition for Rulemaking to amend Part 22 concerning the use of 930 - 931 Mhz for AMS Comments of: Real Time Strategies Inc.	Rulemaking No.: RM-76-17
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Commissioner  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20054

MAR 07 1991

Dear Commissioner,

We are forwarding this letter in support of the Telocator Petition For Rulemaking to amend Part 22 of the Commission's rules concerning the use of 930 - 931 MHz for an Advanced Messaging Service.

We have reviewed the petition dated January 23, 1991 and support the allocation of this frequency range for the use of Advanced Messaging. As a manufacturer of telecommunication systems, we are continually looking at bringing state-of-the-art communication capabilities to the service providers so that they may offer these services to their end users. Our company is about to offer a product which we expect to significantly increase the volume of alphanumeric pagers in use today. Our initial version of the product which we call PAGENTRY™, is utilized as a low cost mechanism for forwarding alphanumeric pager messages to radio paging systems. In addition, the device is capable of forwarding messages to facsimile machines. A copy of our advertisement is enclosed.



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This device currently requires a telephone interconnect to communicate between PAGENTRY and the radio paging system. We believe that with the allocation of the 930 - 931 MHz range, other manufacturers will be encouraged to invest the necessary funds in order to provide a low cost means by which hand-held data entry devices will be able to forward messages in a wireless fashion. We intend to work closely with other manufacturers developing this technology, in order to incorporate this into our device. Without the encouragement by the FCC in the availability of spectrum to provide wireless two way data communication, the technology which will allow us to bring advanced hand-held device communication technology to the end user, may not be developed.

We encourage the FCC to grant the Telocator Petition and allocate this frequency range for message communication services which are currently beyond the capabilities of traditional radio paging systems. We believe that a wireless version of the PAGENTRY device operating in the Advanced Messaging Service frequency range, will have a significant impact on increasing the utilization of alphanumeric paging in the currently allocated spectrum. This will happen by providing users with a low cost, portable means of easily transmitting messages to paging systems, for eventual transmission to alphanumeric pagers at other frequencies. Today, with 10 million pagers in use, only 3% are utilizing alphanumeric pagers to forward more comprehensive messages to mobile individuals. This is because there is no device like the PAGENTRY unit. With the introduction of a low cost input device, the cost of providing alphanumeric paging services will decrease significantly. Operating a PAGENTRY type device in a wireless mode will make message communication from mobile individual to mobile individual even more easy and even further increase the penetration of alphanumeric pagers. With the increased message content of alphanumeric paging, the end user will be capable of maintaining a better degree of communication than that provided by numeric radio paging today.



7/15/11

Thank you for taking this information into consideration in the review of the  
Telocator Petition for Rulemaking.

Sincerely,

A handwritten signature in black ink that reads "Jay Moskowitz". The signature is fluid and cursive, with the first name "Jay" being more prominent and the last name "Moskowitz" following in a similar style.

Jay Moskowitz  
President

JM/jmb